

instead using those funds for **KYRIAZIS's** personal and business purposes.

4. By this fraudulent scheme, **KYRIAZIS** obtained approximately \$975,000 from the victim.

5. In furtherance of this scheme, **KYRIAZIS** did the following, among other things:

- a. represented to the victim that he would invest her funds for her benefit in legitimate and safe investments;
- b. In or about November 2002, induced the victim to cash in a legitimate annuity with a value in excess of \$800,000 and to deposit the proceeds in the victim's bank account;
- c. In November and December 2002, **KYRIAZIS** induced the victim to send a total of approximately \$787,000 to an entity with the words "Investment Group" in its name. **KYRIAZIS** represented to the victim that the funds would be invested on behalf of the victim. Instead, **KYRIAZIS** caused approximately \$700,000 of the funds to be used to purchase approximately 2,000 gold coins, which **KYRIAZIS** took for his own personal use. **KYRIAZIS** used the remainder of the funds to pay his personal home rental fee for a year and to purchase a Porsche automobile.

- c. On or about August 2, 2004, **KYRIAZIS** induced the victim to issue a \$15,000 check drawn on her personal account to "Tierra Verde Spec. Inc.," and caused those funds to be deposited in a bank account in that name. **KYRIAZIS** represented to the victim that the funds were for a legitimate investment for the benefit of the victim. In fact, Tierra Verde Spec. Inc. was at all times an entity located in Florida which operated a small grocery store. Although not identified as an officer or director on the business's public records, **KYRIAZIS** at all times owned and controlled the business and its bank accounts. **KYRIAZIS** used the victim's funds for his own personal purposes;
- d. On or about August 17, 2004, **KYRIAZIS** induced the victim to issue a \$15,000 check drawn on her personal account to "Tierra Spec." **KYRIAZIS** represented to the victim that the funds were for a legitimate investment for the benefit of the victim. Thereafter, **KYRIAZIS** used the victim's funds for his own personal purposes;
- e. On or about August 28, 2004, **KYRIAZIS** induced the victim to issue a \$7,000 check drawn on her personal account to **KYRIAZIS**. **KYRIAZIS** represented to the victim that the funds were for a legitimate investment for the benefit of the victim. Thereafter, **KYRIAZIS**

used the victim's funds for his own personal purposes;

- f. On or about August 30, 2004, **KYRIAZIS** induced the victim to endorse over to "Tierra Verde Spec." three checks she had received from legitimate annuity accounts, specifically checks in the amounts of \$58,155.18, \$34,296.05 and \$56,130.28. **KYRIAZIS** represented to the victim that the funds were for a legitimate investment for the benefit of the victim. Thereafter, **KYRIAZIS** used the victim's funds for his own personal purposes;
- g. When the victim and/or her representatives requested the return of the funds she had given to **KYRIAZIS**, he failed to return any of the funds.

II. COUNT 1 - MAIL FRAUD (18 U.S.C. §1341)

6. The allegations contained in paragraphs 1-5 of this Information are hereby re-alleged and incorporated by reference.

7. On or about November 25, 2002, in the District of Massachusetts and elsewhere, the defendant herein,

CHRISTOS KYRIAZIS,

for the purpose of executing the aforesaid scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, and attempting to do so, did cause to be placed in post offices and authorized depositories for mail matter approximately

100 gold coins to be sent by mail by the United States Postal Service from J.G.M. Numismatic Investments in Beverly, Massachusetts, and did knowingly cause the articles to be delivered by the United States Postal Service, according to directions thereon, to **CHRISTOS KYRIAZIS** in St. Petersburg, Florida.

All in violation of Title 18, United States Code, Sections 1341 and 2.

III. COUNT 2 - (ITSP) (18 U.S.C. §2314)

8. The allegations contained in paragraphs 1-5 of this Information are hereby re-alleged and incorporated by reference.

9. In or about the first two weeks of September 2004, the defendant herein,

CHRISTOS KYRIAZIS,

did transport, transmit and transfer in interstate commerce from Massachusetts to Florida goods, wares, merchandise, securities and money, of the value of \$5,000 or more, knowing the same to have been stolen, converted or taken by fraud; to wit, three

checks totaling approximately \$148,581.51 obtained by the aforesaid scheme and artifice to defraud from his victim.

All in violation of Title 18, United States Code, Sections 2314 and 2.

MICHAEL J. SULLIVAN
United States Attorney

By:


MARK J. BALTHAZARD
Assistant U.S. Attorney

Criminal Case Cover Sheet**U.S. District Court - District of Massachusetts**Place of Offense: _____ Category No. III Investigating Agency FBICity Shrewsbury Related Case Information:County Worcester Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number _____
R 20/R 40 from District of _____**Defendant Information:**Defendant Name CHRISTOS KYRIAZIS Juvenile ☐ Yes ☒ No

Alias Name _____

Address 10460 Roosevelt Blvd. North, #285, St. Petersburg, FLBirth date (Year only): 63 SSN (last 4 #): 2771 Sex M Race: _____ Nationality: _____Defense Counsel if known: Frank Louderback Address: 150 Second Ave. N., Suite 840
St. Petersburg, FL 33701

Bar Number: _____

U.S. Attorney Information:AUSA Mark J. Balthazard Bar Number if applicable 544463Interpreter: ☐ Yes ☒ No List language and/or dialect: _____Matter to be SEALED: ☐ Yes ☒ No☐ Warrant Requested ☒ Regular Process ☐ In Custody**Location Status:**

Arrest Date: _____

☐ Already in Federal Custody as _____ in _____☐ Already in State Custody _____ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by _____ on _____Charging Document: ☐ Complaint ☒ Information ☐ IndictmentTotal # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 2

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 4/25/05 Signature of AUSA: 

JS 45 (5/97) - (Revised USAO MA 3/25/02) Page 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant CHRISTOS KYRIAZIS

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. §1341</u>	<u>Mail Fraud</u>	<u>1</u>
Set 2	<u>18 U.S.C. §2314</u>	<u>Interstate Trans. Of Property Taken By Fraud</u>	<u>2</u>
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: